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NATURAL HERITAGE
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January 16, 2006

Vernon A. Williams, Secretary
Surface Transportation Board
1925 "K" Street, NW
Washington, D.C. 20423-0001

ENTERED
Office of Proceedings

JAN 17 2006

Part of
Public Record

RE: Docket Number AB-1067 (Sub-No. 1X) General Railway Corporation
(dba Iowa Northwestern Railroad), Abandonment Exemption in Osceola and
Dickinson Counties, Iowa.

Dear Mr. Williams:

This comment should be treated as a petition for reconsideration in the
above-captioned proceeding. This comment is filed on behalf of the Osceola
County Conservation Board (public agencies), the Dickinson County Trails
Board (public agency), the Dickinson County Trails Alliance, and the Iowa
Natural Heritage Foundation (non-profit corporations), which are parties
interested in conservation and recreation, and are hereinafter referred to as
"Commenter".

While not taking a position on the merits of this abandonment,
Commenter requests issuance of a Public Use Condition as well as a Certificate
or Notice of Interim Trail Use rather than an outright abandonment authorization
of the 17.05 mile corridor between Milepost 235.25 west of Lake Park, IA and
Milepost 252.3 west of Allendorf, IA in Dickinson and Osceola Counties, Iowa.

A. Public Use Condition

Commenter requests the STB to find that this property is suitable for
other public use, specifically trail use, and to place the following conditions on
the abandonment:

1. An order prohibiting Union Pacific Railroad (UPRR) from disposing of the corridor, including tracks, ties and signal equipment, except for public use on reasonable terms. The justification for this condition is that the corridor would extend an existing trail that is located between Allendorf and Sibley in Osceola County and the conversion of the property to trail use is in accordance with local, state and regional trail plans. The corridor also provides important wildlife habitat in a region of the state that experiences considerable outdoor recreation activities. The time period sought is 180 days from the effective date of the abandonment authorization. Commenter needs this much time to complete review title information and commence negotiations with the carrier.
2. An order barring removal or destruction of potential trail-related structures such as bridges, trestles, culverts and tunnels. The justification for this condition is that these structures have considerable value for trail purposes and future reactivation of rail service. The time period requested is 180 days from the effective date of the abandonment authorization for the same reasons indicated above.

B. Interim Trail Use

The railroad right-of-way in this proceeding is suitable for railbanking and interim trail use. In addition to the public use conditions sought above, Commenter also makes the following statement:

STATEMENT OF WILLINGNESS TO ASSUME FINANCIAL RESPONSIBILITY:

In order to establish interim trail use and rail banking under section 8(d) of the National Trails System Act, 16 U.S.C. §1247(d), and 49 C.F.R. §1152.29, Commenter is willing to assume full responsibility for management of, for any legal liability arising out of the transfer or use of (unless the user is immune from liability, in which case it need only indemnify the railroad against any potential liability). Commenter is willing to assume full responsibility for management of, for any legal liability arising out of the

transfer or use of and for the payment of any and all taxes that may be levied or assessed against the right-of-way owned and operated by General Railway Corporation/Iowa Northwestern Railroad.

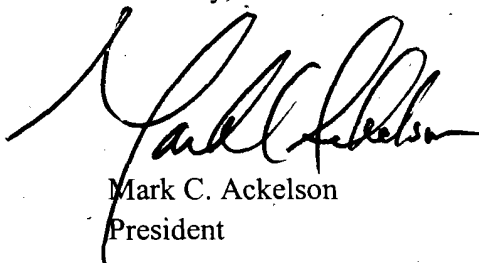
The Osceola County Conservation Board, the Dickinson County Trails Board, the Dickinson County Trails Alliance, and the Natural Heritage Foundation acknowledge that the use of the right-of-way is subject to the user's continuing to meet its responsibilities described above and subject to possible future reconstruction and reactivation of the right-of-way for rail service.

The property, known as Allendorf to Lake Park line the extends from railroad milepost Milepost 235.25 west of Lake Park, IA and Milepost 252.3 west of Allendorf, IA in Osceola and Dickinson Counties, Iowa. The right-of-way is part of a line of railroad proposed for abandonment in STB Docket Number AB-1067 (Sub-No. 1X). A map depicting the right-of-way is attached

By my signature below, I certify service upon John Larkin, General Railway Corporation/Iowa Northwestern Railroad, 4814 Douglas St., Omaha, NE 68132, by U.S. Mail, postage prepaid, first class, this day, January 16, 2006.

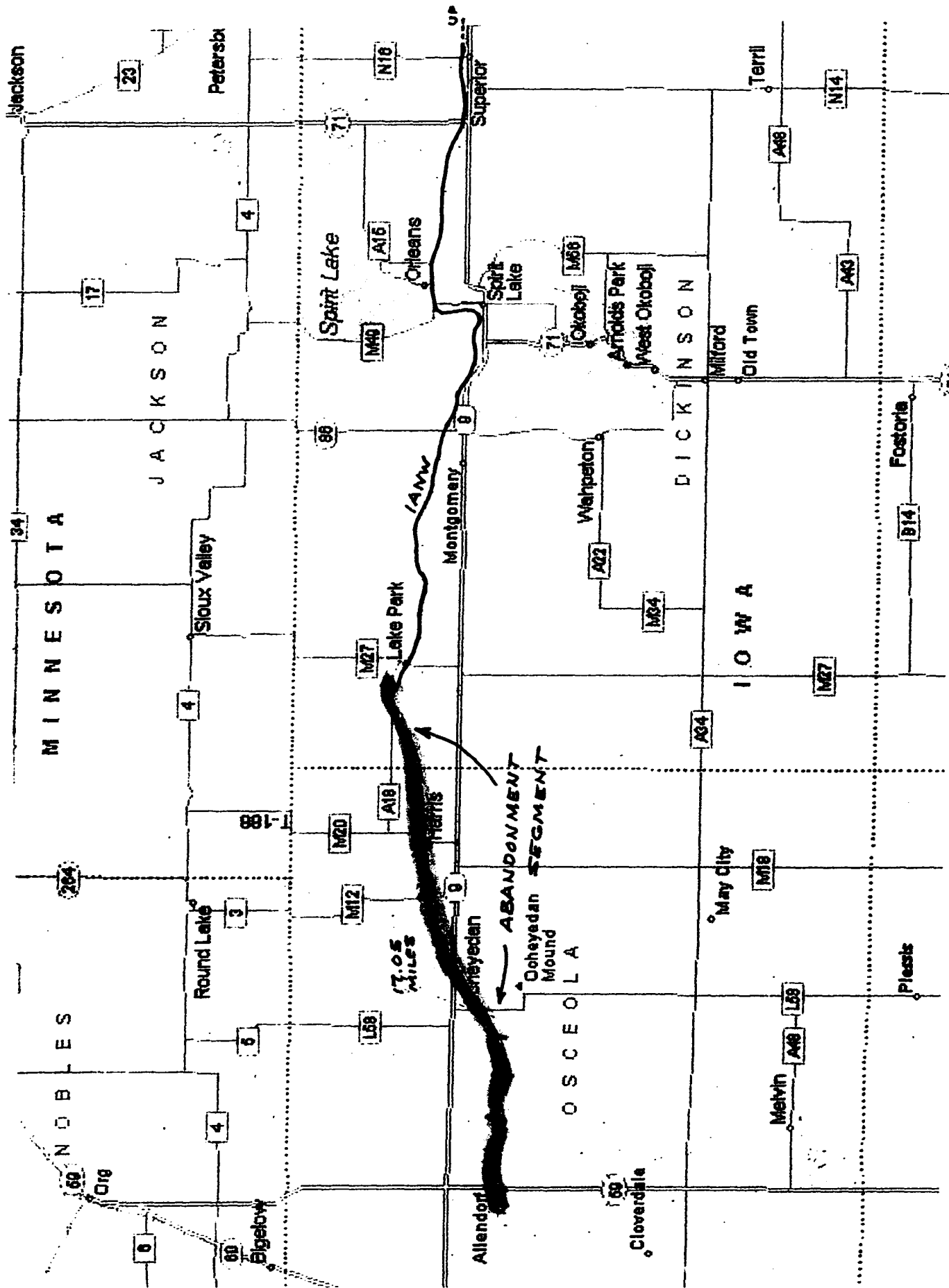
On behalf of the Osceola County Conservation Board, the Dickinson County Trails Board, the Dickinson County Trails Alliance, and the Iowa Natural Heritage Foundation, thank you for your consideration of this petition.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark C. Ackelson", is written over a horizontal line.

Mark C. Ackelson
President

C: Osceola CCB, DCTB, DCTA



Map of Iowa Northwestern Railroad
Proposed Abandonment Highlighted In



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CERTIFICATE OF SERVICE

I hereby certify that on this 16th Day of January 2006. I have served a true and accurate copy of the foregoing motion on the following party via first-class mail, postage pre-paid.

John Larkin
General Railway Corporation/Iowa Northwestern Railroad
4814 Douglas St.
Omaha, NE 68132

Mark C. Ackelson, President
Iowa Natural Heritage Foundation